

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

CLEVELAND WOODS,

Plaintiff,

UNION PACIFIC RAILROAD COMPANY

Defendant.

§
§
§
§
§
§
§
§
§

Case No. 3:11-CV-350

PLAINTIFF'S INITIAL DISCLOSURES

Cleveland Woods, Plaintiff, files his initial disclosures as required by FED. R. CIV. P. 26(a)(1).

A. Individuals with Discovery Information

The following persons are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings:

Plaintiff

Cleveland K. Woods, Jr.
34 Evening Song Court
The Woodlands, Texas 77380
832/764-0682

Plaintiff has knowledge about the scene, the reports of injuries and actions immediately taken after the accident. Plaintiff also has knowledge of his medical history, injuries and treatment, and all other losses sustained in this accident.

Claims Agent

Greg Jensen
Union Pacific Railroad Company
24125 Aldine Westfield
Spring, Texas 77373

Witnesses

Randy Kanneck
206 Airline Street
Spring, Texas 77373
936/443-5181

Mr Kanneck was the Conductor. He witnessed the incident, saw him fall, was taking 2 of

Cleveland's bags for him.

Kamron T. Saunders
P.O. Box 11
Smithville, Texas 78957
512/581-8456
Mr. Saunders was the Engineer on EJVCRR.

Timothy J. Kelly
934 S. Lincoln Ave.
Mart, Texas 76664
501/835-9333
Mr. Kelly was the Conductor on EJVCRR.

Joseph Borden
Senior Manager Terminal operation
2003 Market Street
Hearne, Texas 77859
979/279-9467
979/450-6489 cell
Mr. Borden was Plaintiff's Supervisor at the time of his injury.

Medical Providers

The Woodlands Sports Medicine Centre, P.A.
1441 Woodstead Court, Suite **300**
The Woodlands, Texas 77380
281/367-0400

Brian Chimenti, MD
The Woodlands Sports Medicine Centre Physical Therapy and Rehabilitation, Inc.
1441 Woodstead Court, Suite 200
The Woodlands, Texas 77380
281/364-7752

Woodstead MRI
1733 Woodstead Court, Suite 100
The Woodlands, Texas 77380
281/364-8840

Lenny Q. Jue, M.D.

The Surgery Center of The Woodlands
1441 Woodstead Court, Suite 100
The Woodlands, Texas 77380-1465
281/363-0058

David F. Villacres, MD
3407 River Edge Trail
Kingwood, Texas 77339
281/361-5990

David W. Wimberly, MD
Fondren Orthopedic Group
74015 Main Street
Houston, Texas
713/799-2300

Saqib A. Siddiqui, MD
The Spine Center
1111 Medical Plaza Dr., Suite 230
The Woodlands, Texas 77380
866/697-7463

Humble Surgical Hospital
1475 FM 1960 Bypass Rd. East
Humble, Texas 77338
281/964-2100

Cole Rehab & Physical Therapy
25510 I-45 N., Suite 100
The Woodlands, Texas 77386
281/419-1330

Memorial Hermann - The Woodlands
9250 Pinecroft Dr.
Shenandoah, Texas 77380
281/364-2300

MHHS Outpatient Imaging The Woodlands
9200 Pinecroft Dr.
The Woodlands, Texas 77380

Woodlands Sports Medicine Radiology

1441 Woodstead Ct., Suite 320
The Woodlands, Texas 77380
281/367-0400

B. Relevant Documents and Tangible Things

The following is a list of documents, data compilations, and tangible things in Plaintiff's possession, custody or control, described by category and location, that said Plaintiff believes are relevant to disputed facts alleged with particularity in the pleadings:

1. Medical records from treating physicians.

C. Information Related to Calculations of Damages

Plaintiff will claim damages under the following categories:

Lost Wages and Benefits. Plaintiff will claim past and future wage loss. The exact amount of the wage and benefit loss cannot be calculated until earning records, in possession of Defendant, are produced. At that time, Plaintiff will have an economist provide a wage and benefit loss report. Plaintiff has also suffered a reduction in his ability to earn future wages.

Pain and Suffering. Plaintiff will claim damages for pain and suffering in an amount determined by the jury.

Mental Anguish. Plaintiff will claim damages for mental anguish in an amount determined by the jury.

Physical Impairment and/or Disfigurement. Plaintiff will claim damages for physical impairment and/or disfigurement in an amount determined by the jury.

Medical Bills and Expenses. Plaintiff has incurred medical bills and expenses. The amounts are contained in the medical billing records that have been produced. Additional bills have been requested. In addition, Plaintiff believes physician testimony may establish future medical expenses that Plaintiff may incur.

D. Insurance

Not Applicable.

Respectfully submitted,

JONES, GRANGER, TRAMUTO & HALSTEAD

By: s/Robert M. Tramuto

ROBERT M. TRAMUTO

Attorney-in-Charge

TBN: 20186300, Fed ID: 6863

10,000 Memorial Drive, Suite 888

P.O. Box 4340

Houston, Texas 77210

Phone: 713/ 668-0230

Fax: 713/ 956-7139

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was properly forwarded to counsel of record listed below by Electronic Filing - Via Clerk on this 9th day of September, 2011.

Fred S. Wilson
Union Pacific Railroad Company
808 Travis, Suite 620
Houston, Texas 77002

By: s/ Robert M. Tramuto
Robert M. Tramuto